



European  
Automobile  
Manufacturers  
Association

# Mid-term evaluation

## Commission road safety policy orientations 2011- 2020



November 2014



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## ACEA COMMENTS

### **DG Move's discussion paper for the workshop on 17 November 2014**

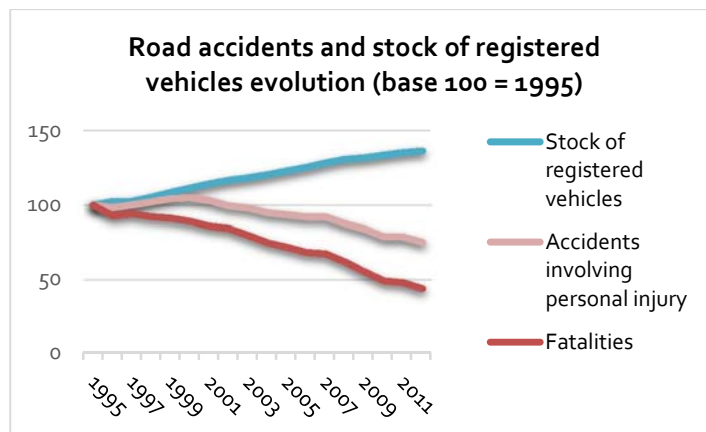
The European Automobile Manufacturers Association (ACEA), welcomes the invitation to participate in the preparation of the mid-term evaluation of the Commission's road safety policy orientations 2011 – 2020. ACEA is pleased to reply to the questions anticipated by DG Move in preparation of the workshop of 17 November 2014.

# QUESTIONS

## ASSESSING THE WORK 2011-2014

1. Do you believe that EU level initiatives have contributed to the decreased number of road fatalities during the last couple of years? In what areas do you consider EU actions for road safety to have been most efficient and successful?

Substantial reductions in road fatalities and serious injuries are not limited to the last couple of years. They have been achieved in EU Member States since the last two decades, despite the trend of increasing traffic volume over the same period of time:

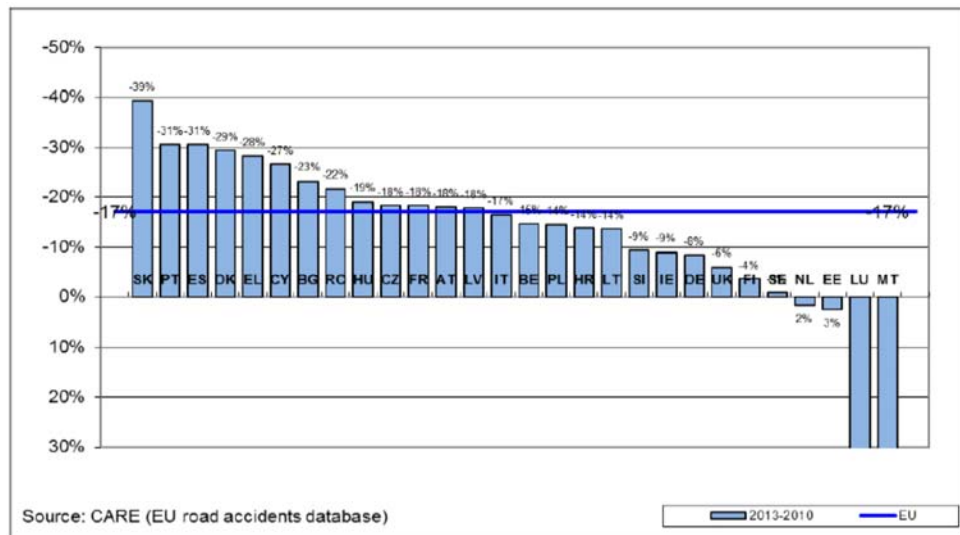


Source: EUROSTAT STATISTICAL POCKETBOOK 2014

In particular during the last couple of years, these reduction trends have continued despite important differences amongst countries at different stages of their road safety activity and management, with some Member States having recently joined the motorisation level of more mature markets.

The role of the European Automobile industry in this impressive record has been essential. The European manufacturers are leaders in safety technologies worldwide and the sector consistently sustains high investments in R&D, being the EU's largest investor sector in R&D. A large proportion is dedicated to developing further initiatives to enhance the passive and active safety features of new vehicles. ACEA members have a long track record regarding road safety, based on innovation and responsibility.

### Evolution of fatalities 2010-2013



New safety technologies that can improve safety by assisting the driver will be soon available or are already entering the market now. The deployment of these technologies, focused on accident avoidance rather than accident mitigation, should be promptly assessed given their potential benefits for the prevention and compensation of human error, by large the most important accident factor. A robust and standardized European accident data base, available to all stakeholders, would help in assessing efficiency of the technologies.

EU actions for road safety should be fully in line with an integrated approach; experience from the best performing Members States and those that are progressing fastest show that higher reductions in deaths are associated with a combination of countermeasures, including education, training, enforcement of existing traffic law coupled with stricter sanctions, improved vehicle safety and infrastructure safety.

## 2. Do you see any unintended positive or negative effects produced by Commission road safety initiatives – if so, what?

So far, the Commission’s main pillar for road safety has been technology. But road safety technologies have limits in terms of costs and efficiency. Affordability of new vehicles, especially in new Member States, remains an essential element of road safety policy. Measures to drive fleet renewal are to be encouraged since the average age of cars in some countries can be up to 14 years.

Replacing less safe older cars from the fleet will help but so too will improvements in infrastructure, enforcement and driver/road user education.

Also, the European automotive industry acts now on a global market and this should also be systematically taken into account in proposing new measures, i.e. preferring UNECE Regulations vs. EU legislation and assessing the impact of new measures on the competitiveness of the European industry.

For non-established in-vehicle technologies, adequate lead-time in line with agreed CARS21 principles must be provided for manufacturers and even more upstream, appropriate RDI funding is of valuable importance. Funding in RDI should focus on maintaining and strengthening European technological leadership in advanced safety solutions.

Attention should also be paid to the impact of the safety measures on the environment.

### **3. Do you believe the same results could have been achieved easier or at a lower cost in other ways (e.g. by soft measures instead of legislation or vice-versa)?**

Whilst the number of road fatalities in the EU has fallen, road traffic injuries remain the leading cause of death in the EU among young people. Roughly 40% of those who die in road traffic accidents are vulnerable road users (i.e. pedestrians, cyclists and users of motorised two-wheelers) who also account for 68% of the fatalities in urban areas. Improving road safety via integrated approach recognising the role of the driver/road user, infrastructure and vehicles therefore remains a priority.

As part of this integrated approach, envisaged measures on vehicle technology need to be carefully weighted (e.g. cost/effectiveness), compared and completed with possible alternative measures on driver/road user behaviour (e.g. education, enforcement measures, driver training) and infrastructure. Given that the real-life impact of new measures on vehicle construction and equipment is delayed by the slow rate of fleet renewal, in certain cases, alternatives to legal measures (e.g. information campaigns,) need to be evaluated in comparison to more efficient than legislation to deploy new technologies without impairing the affordability of vehicles for consumers. The EU road safety policy needs to be based on a right policy mix covering actions on vehicles, infrastructure and drive/road user behaviour.

Future road safety regulations have to be based on accident data evidence and on the most cost-effective approach.

**4. Do you believe the same results could have been achieved by Member States at national and/or regional level without the EU interventions?**

Regional and local administrations can and should play a crucial role in the non-technical pillars of an integrated approach, namely enforcement, training and education, public awareness rising and informing on road safety, as well as in safe infrastructure. They must be taken into account as privileged partners concerning road safety.

**5. Do you believe the same or better results could have been achieved by an alternative organisational set-up at EU level (e.g. a separate road safety agency)?**

A separate road safety agency would have not guaranteed, in our opinion, better results. However, it is very important that the different Commission's DGs and units within the same DG dealing with road safety work in closer cooperation.

## REVIEWING THE FRAMEWORK FOR CONTINUED EFFORTS

**6. Do you consider the strategic target on 50% reduction of road deaths to still be relevant and realistic with regard to the size and characteristics of road safety problems in the EU today?**

Yes, the strategic target on 50% reduction of road deaths is still relevant. Many new measures already adopted will take effect over the next years and should further improve road safety.

However, also additional actions, besides vehicle technology related legislation, will be needed in order to advance in the long-term "vision zero" set out in the Transport White Paper and reach the objectives spelled out in the policy orientations on road safety 2011-2020 (halving the number of fatalities by 2020 in relation to 2010).

**7. Do you consider the seven strategic objectives of the Policy**

**orientations on road safety still relevant in relation to the current main road safety problems and challenges – should anything be deleted or added to this list?**

The industry welcomed the clear recognition, for the first time, by the Commission in its road safety policy orientations 2011-2020, that an Integrated Approach to road safety was key for achieving the EU road safety targets. Unfortunately, this was not, in our opinion, fully reflected in the measures that were put forward in the document. Indeed, the only binding measures in the Commission's policy orientations referred to technical measures for vehicles. Whereas only one out of the seven objectives identified referred to safer vehicles, the Commission announced actions related to vehicle technical measures in four out of the seven objectives.

**8. Would you propose any additional, realistic measures at EU level (respecting the subsidiarity and proportionality principles and within EU competence) that could address the current/future problems and challenges of road safety in order to contribute to the 2020 strategic target?**

The integrated approach must be implemented thoroughly. Technology should not be seen as the only solution. Further investment into infrastructure is needed to multiply opportunities given by new safety devices on vehicle side. The role of Member States is crucial in this aspect, using full variety of EU instruments to support infrastructure development throughout EU and enforcing existing legislation. In particular, deployment of ITS technologies should actively be supported.

In line with the CARS 2020 Action Plan and the policy orientations on road safety 2011-2020, future work on road safety should follow an integrated approach, recognising the role of the driver/road user, infrastructure and vehicles. Alongside the effective enforcement of the existing measures (reinforced by dedicated market surveillance activities with the economic operators on the market), new EU actions could help to further improve road safety (both in terms of reducing the number of casualties and serious injuries). Education regarding rights and obligations and safe behaviour of drivers and other road users on roads and continuous information campaigns complemented by enforcement of the existing rules are key instruments to arrive at a safer road environment.

The preparation of new measures by the Commission, notably via studies, should involve stakeholders at multiple stages of the process to be carried out. It is important that interest groups can raise awareness for specific issues to be incorporated in the study.



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## ABOUT ACEA

ACEA's members are BMW Group, DAF Trucks, Daimler, Fiat Chrysler Automobiles, Ford of Europe, Hyundai Motor Europe, IVECO, Jaguar Land Rover, Opel Group, PSA Peugeot Citroën, Renault Group, Toyota Motor Europe, Volkswagen Group, Volvo Cars, Volvo Group. More information can be found on [www.acea.be](http://www.acea.be).

## ABOUT THE EU AUTOMOBILE INDUSTRY

- Some 12.7 million people - or 5.8% of the EU employed population - work in the sector.
- The 3.1 million jobs in automotive manufacturing represent 10.3% of EU's manufacturing employment.
- Motor vehicles account for €388.8 billion in tax contribution in the EU15.
- The sector is also a key driver of knowledge and innovation, representing Europe's largest private contributor to R&D, with €32.3 billion invested annually.

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